

## **ROCKY FLATS SITE REGULATORY CONTACT RECORD**

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**Purpose:** Changes to Present Landfill Inspection and Monitoring Frequencies and Modification of the PLF Monitoring and Maintenance Plan.

**Contact Record Approval Date:** December 21, 2007

**Site Contact(s) / Affiliation(s):** Scott Surovchak, DOE, Linda Kaiser, S.M. Stoller, Jeremiah McLaughlin, S.M. Stoller, George Squibb, S.M. Stoller, John Boylan, S.M. Stoller, Jody Nelson, S.M. Stoller, Rick DiSalvo, S.M. Stoller

**Regulatory Contact(s) / Affiliation(s):** Carl Spreng / CDPHE

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**Discussion:** The Present Landfill Monitoring and Maintenance Plan and Post-Closure Plan, May 2006, (PLF M&M Plan) includes certain inspection and monitoring requirements that may be changed or phased out over time as conditions warrant, in accordance with the PLF M&M Plan. Also, the PLF M&M Plan was written before the Corrective Action Decision/Record of Decision (CAD/ROD) was approved in September 2006 and the Rocky Flats Legacy Management Agreement (RFLMA) to implement the CAD/ROD was drafted and became effective in March, 2007. The PLF M&M Plan is incorporated by reference as an enforceable requirement of RFLMA (See RFLMA Attachment 2, section 5.3.1, and Tables 1-3). RFLMA terminated and supersedes the Rocky Flats Cleanup Agreement (RFCA) and the PLF M&M Plan references RFCA in certain sections.

This Contact Record is to document changes in inspection frequencies, completion of certain monitoring requirements that now may be phased out, clarification of vegetation inspection schedules and completion criteria in accordance with the PLF M&M Plan. It is also to document agreement between DOE and CDPHE to revise the M&M Plan so that the M&M Plan text recognizes the implementation of the remedy under RFLMA.

Pursuant to RFLMA paragraph 66, DOE and CDPHE do not consider these items to constitute a significant change from existing requirements of RFLMA, and this Contact Record shall be used to provide public notice of modifications to the PLF M&M Plan. Also, CDPHE may approve modifications to RFLMA Attachments pursuant to RFLMA paragraph 65. (Note that the Original Landfill (OLF) M&M Plan will also require updating revisions, since it was also approved prior to RFLMA. DOE will consult with CDPHE on changes to the OLF M&M Plan after the ongoing investigation of seeps and slumping on the OLF soil cover is completed.)

The groundwater and surface water monitoring plans in the PLF M&M Plan reference RFCA and the RFCA Integrated Monitoring Plan. These have been superseded by RFLMA, so the PLF M&M Plan revision will reflect the RFLMA requirements, which include the following RFLMA Attachment tables and figures:

- Table 1, Surface Water Standards
- Table 2, Water Monitoring Locations and Sampling Criteria
- Table 3, Present and Original Landfill Inspection and Maintenance Requirements
- Figure 10, RCRA Wells
- Figure 11, Groundwater Treatment Systems

Inspection Frequencies: Table 1, below, shows the PLF inspection frequency requirements as summarized in RFLMA Attachment 2, Table 3 that are being changed, and the new frequencies. Note that the frequencies for stability and erosion control inspections were evaluated in the recently completed CERCLA periodic review, as described in the *Second Five-Year Review Report for the Rocky Flats Site*, September 2007. The next CERCLA five-year review will be conducted in 2012.

Table 1

<b>RFLMA Inspection and Maintenance Requirements – derived from RFLMA Attachment 2, Table 3</b>		<b>Result of consultation and 5-Year review</b>
<b>Requirement and Description of Activity</b>	<b>Frequency/Status</b>	<b>New Frequency</b>
Final cover inspection and monitoring <ul style="list-style-type: none"> <li>✓ inspect/monitor slope stability, soil cover</li> <li>✓ visually inspect surface of landfill cover for cracks, depressions, heaving, and sinkholes</li> </ul>	monthly for first year/completed	quarterly – evaluate frequency in subsequent CERCLA periodic review
Final cover inspection and monitoring <ul style="list-style-type: none"> <li>✓ monitor settlement monuments and side slope stability monuments</li> </ul>	quarterly for first year/completed	annually – evaluate frequency in subsequent CERCLA periodic review
Final cover inspection and monitoring <ul style="list-style-type: none"> <li>✓ vegetation monitoring</li> </ul>	quarterly for first year/completed	monthly for noxious weeds during growing season (April-September) and annually for vegetation until PLF M&M Plan quantitative grassland success criteria is met.
Final cover inspection and monitoring <ul style="list-style-type: none"> <li>✓ additional weather-related inspections after storm event of one inch or more of rain in a 24-hour period or significant melt of 10-inch or more snowstorm</li> </ul>	after event (no time specified)/ongoing	within 2 days after event (This is consistent with RFLMA Attachment 2, Table 3 for the OLF.)
Inspection and monitoring of stormwater management system and erosion control features <ul style="list-style-type: none"> <li>✓ visually inspect stormwater management structures (channels/lining, culverts, and outfalls)</li> <li>✓ visually inspect erosion control features (perimeter channels and natural drainages);</li> <li>✓ visually inspect seep treatment system</li> </ul>	monthly for first year/completed	quarterly – evaluate frequency in subsequent CERCLA periodic review
Inspection and monitoring of stormwater	after event (no time	within 2 days after event

<b>RFLMA Inspection and Maintenance Requirements – derived from RFLMA Attachment 2, Table 3</b>		<b>Result of consultation and 5-Year review</b>
<b>Requirement and Description of Activity</b>	<b>Frequency/Status</b>	<b>New Frequency</b>
management system and erosion control features <ul style="list-style-type: none"> <li>✓ additional weather-related inspections after storm event of one inch or more of rain in a 24-hour period or significant melt of 10-inch or more snowstorm</li> </ul>	specified)/ongoing	(This is consistent with RFLMA Attachment 2, Table 3 for the OLF.)

Water Monitoring Sampling Criteria: Two PLF water monitoring locations specified in the PLF M&M Plan, the Groundwater Interceptor System (GWIS) influent to the PLF Treatment System (PLFTS), are required by the PLF M&M Plan to be sampled for one year, and the results evaluated by the RFCA Parties. These two locations, identified as GWISINFNORTH and GWISINFSOUTH in RFLMA Attachment 2, Table 2 have been sampled quarterly for the last two years. These locations are included in the evaluations required in RFLMA Attachment 2, Figure 11, and monitoring may be discontinued based on the consultative process. The results have been evaluated by DOE and CDPHE and the data do not present any reason to continue quarterly sampling. Thus, the frequency for sampling in RFLMA Attachment 2, Table 2 will be changed to “discontinued”. A footnote will be added to indicate these sampling locations may be used for investigation purposes.

In addition, the PLF M&M Plan requires sampling the PLFTS effluent for metals, plutonium, isotopic uranium, volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs). RFLMA Attachment 2, Table 2 does not include sampling for plutonium. To resolve differences in the PLF M&M Plan and RFLMA analyte lists, the PLF M&M Plan will be revised to defer to the analytes in RFLMA.

Table 2, below, shows the PLF water monitoring requirements as summarized in RFLMA Attachment 2, Table 2, that are being changed and the new requirement.

Table 2

<b>RFLMA water Monitoring Locations and Sampling Criteria Requirements – derived from RFLMA Attachment 2, Table 2</b>		<b>Result of consultation</b>
<b>Requirement and Description of Activity</b>	<b>Frequency/Status</b>	<b>New Frequency</b>
Present Landfill Treatment System <ul style="list-style-type: none"> <li>✓ GWISINFNORTH</li> <li>✓ GWISINFSOUTH</li> </ul>	quarterly for VOCs, Isotopic U, metals, nitrate	discontinue – add footnote indicating may be used for investigation purposes

Other Criteria: Surface water standards may change from time to time, based upon regulatory actions, and RFLMA Attachment 2, Table 1 will be updated to reflect changes from time to time. Since the PLF M&M Plan will be changed to defer to the RFLMA analyte list, no changes to the PLF M&M Plan will be required if surface water standards change in the future. Currently, there are no changes needed for RFLMA Attachment 2, Table 1.

**Resolution:** The PLF inspection and monitoring frequencies shall be implemented as described in Table 1 and 2 of this Contact Record, above, and RFLMA Attachment 2, Tables 2 and 3 will be modified accordingly. The PLF M&M Plan will be modified as described herein.

Pending the submittal of the modifications for approval, Carl Spreng, CDPHE, approved the immediate implementation of the changed inspection frequencies and water monitoring sampling criteria as described in this Contact Record.

DOE anticipates the modifications to RFLMA Attachment 2, Tables 2 and 3, and the modifications to the PLF M&M Plan will be submitted to CDPHE for approval by January 1, 2008. There are no changes needed for RFLMA Attachment 2 Figures 10 and 11.

**Closeout of Contact Record:** The status of actions or activities documented by RFLMA Contact Records will be documented by DOE from time to time, and included in RFLMA quarterly and/or annual surveillance and maintenance reports for tracking purposes. This Contact Record will be closed when:

- Modified RFLMA Attachment 2, Tables 2 and 3 approved by CDPHE and posted to the DOE website. Notification of the availability of the modification made by DOE in accordance with RFLMA Appendix 2, *Public Involvement Plan*.
- Modified PLF M&M Plan approved by CDPHE and posted to the DOE website. Notification of the availability of the modification made by DOE in accordance with RFLMA Appendix 2, *Public Involvement Plan*.

**Contact Record Prepared by:** Rick DiSalvo, S.M. Stoller

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**Distribution:**

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